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12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 v.
20 RAYLON THIJAY RANDLE,
21 Defendant.

22 CASE NO. 1:21-CR-00246-DAD-BAM
23 STIPULATION REGARDING EXCLUDABLE
24 TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER
DATE: December 22, 2021
TIME: 1:00 p.m.
COURT: Hon. Magistrate Judge Barbara A. McAuliffe

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28 **STIPULATION**

29 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
30 through defendant's counsel of record, hereby stipulate as follows:

31 1. By previous order, this matter was scheduled for a status conference on December 22,
32 2021.
33 2. By this stipulation, the parties move to continue the status conference until February 23,
34 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial
35 Act between December 22, 2021, and February 23, 2022.

36 3. The parties agree and stipulate, and request that the Court find the following:
37 a) Initial discovery was provided to defendant on or about October 18, 2021,
38 consisting of 114 Bates-stamped items of reports of investigation, body worn camera recordings,
39 photographs, certified conviction records and a summary of defendant's criminal history.

b) Counsel for defendant desires additional time to review discovery, consult with her client, conduct investigation and research related to the charges, and to otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of December 22, 2021 to February 23, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results from a continuance granted by the Court request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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6 Dated: December 15, 2021

7 PHILLIP A. TALBERT
8 Acting United States Attorney

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10 /s/ CHRISTOPHER D. BAKER
11 CHRISTOPHER D. BAKER
12 Assistant United States Attorney

13 Dated: December 15, 2021

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15 /s/ CHRISTINA CORCORAN
16 CHRISTINA CORCORAN
17 Counsel for Defendant
18 RAYLON THIJAY RANDLE

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20 **ORDER**

21 IT IS SO ORDERED that the status conference is continued from December 22, 2021, to **February
22 23, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to
23 18 U.S.C. § 3161(h)(7)(A), B(iv).

24 IT IS SO ORDERED.

25 Dated: December 15, 2021

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27 /s/ *Barbara A. McAuliffe*

28 UNITED STATES MAGISTRATE JUDGE